

THE McDANIEL LAW FIRM, PC
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Attorneys for Plaintiff Baseprotect USA, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

BASEPROTECT USA, INC.,

Plaintiff,

v.

SWARM #06159, a joint enterprise, and
JOHN DOES 1-X, such persons being
presently unknown participants and
members of the joint enterprise,

Defendants.

Civ. Action No. 2:11-cv-7288(SDW)(MCA)

**NOTICE OF CROSS-MOTION FOR A
PRELIMINARY INJUNCTION**

MOTION RETURNABLE: JUNE 18, 2012

ORAL ARGUMENT REQUESTED

TO: Darius A. Marzec, Esq.
MARZEC LAW FIRM
225 Broadway, Suite 3000
New York, New York 10007

PLEASE TAKE NOTICE that Plaintiff **BASEPROTECT USA, INC.** will move before this Court on **June 18, 2012 at 9:00 A.M.**, or as soon thereafter as counsel may be heard, for an Order granting a Preliminary Injunction to enjoin and restrain Defendant Swarm #06159¹ and Doe Defendant identified by IP address 24.13.138.223 from the continuing unlawful distribution of the copyrighted movie *Weekend* on the Internet and, further, from destroying evidence of previous unlawful distribution of the work that is discoverable later in the litigation.


¹ For ease of reference in this application, the hash number used to identify the Swarm has been truncated to its first five characters. The full has number is 06159132D21BBC88ED40B6E51278879F2725243F. See Exhibit A to Complaint.

TAKE FURTHER NOTICE that in support thereof Baseprotect shall rely on the within Declaration of David Farris and Memorandum of Law.

TAKE FURTHER NOTICE that oral argument is requested.

DATED: June 4, 2012

THE MCDANIEL LAW FIRM, PC

By: 
Jay R. McDaniel, Esq.
Attorneys for Plaintiff
Baseprotect USA, Inc.